Amendment dated: October 19, 2006

Reply to OA of: April 19, 2006

REMARKS

Reconsideration of the present patent application is respectfully requested in

view of the following remarks.

I. Response to Objection on the Drawings Under 37 CFR 1.83(a)

This rejection was on the basis that the feature recited in claim 8, "wherein

positive and negative polarities of the characteristic curve," was not shown in the

drawings. In reply, the applicant has canceled claim 8.

II. Response to Rejections Under 35 U.S.C. § 112

Examiner indicates that claim 3 of the present patent application is rejected

under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description

requirement. In addition, the Examiner also indicates that claim 8 of the present patent

application is rejected under 35 U.S.C. § 112, second paragraph, as being indefinite

for failing to particularly point out and distinctly claim the subject matter which

applicant regards as the invention.

In reply to the first paragraph rejection, the applicant has amended claim 3 to

clarify that the coded data is first received and sampled by sample/latch units and then

transmitted to the digital-to-analog converters, as illustrated in Fig. 3 and described in

lines 4-13 on page 4 of the original specification, and consistent with the Examiner's

interpretation.

The second paragraph rejection has been rendered moot by the cancellation

of claim 8.

-4-

Amendment dated: October 19, 2006

Reply to OA of: April 19, 2006

III. Response to Rejections Under 35 U.S.C. § 102

The Examiner indicates that claims 1, 2, 4 and 6-8 of the present patent

application are rejected under 35 U.S.C. § 102 as being anticipated by the US Patent

No. 6,462,735 (Naito et al.).

In response to this rejection, the applicant has first amended claim 1 of the

present application to recite the characteristics of the "plurality of characteristic

curves" into claim 1. The amended claim 1 is shown in the aforesaid listings of claims.

In particular, claim 1 now recites that the "coding unit" of the claimed driving circuit now

generates a plurality of "coded data" according to a plurality of characteristic curves at

the same time, wherein the plurality of characteristic curves are Gamma curves for

three chromatic lights (red, green, and blue), respectively. Instead of processing red,

green, and blue together in the manner of the claimed invention, the Naito patent

processes the respective colors separately.

Unlike the claimed invention, the "ASIC 210" of the driving circuit of the display

device of the cited Naito patent can only process a digital picture signal of one of the

three chromatic lights output from the "A/D converter 100" at a single processing time

of the ASIC. Then, after the picture signal is processed, for example by performing the

"gamma correction process", the "phase expansion process", and the "digital polarity

inversion process" on the picture signal by the ASIC, the picture signal is sent to the

"D/A conversion block 260" for digital-to-analog conversion.

As described in column 8, lines 43 to 60 of the specification of the Naito patent,

the picture signal of each chromatic light, i.e., one of the three chromatic lights

comprising red (R), green (G), and blue (B), is first analog-to-digital converted by the

A/D converter 100. Only then is the digitized picture signal of one of the three

- 5 -

Amendment dated: October 19, 2006

Reply to OA of: April 19, 2006

converted by the "D/A converter 260". Therefore, the picture signals of all three chromatic lights disclosed in the Naito are <u>separately</u> processed. In other words, the picture signals corresponding to the three chromatic lights of Naitomay be processed with three different sets of "signal processing circuit 200" at the same time, or be processed with the same set of "signal processing circuit 200" using a time-domain multiplex method, but the lights cannot be processed with one circuit at one time.

In summary, after the amendment to claim 1, the "coding unit" of the driving circuit of claim 1 of the present patent application can process all three characteristic curves (Gamma curves) respectively for three chromatic lights at the same time. There is no need in the claimed processing circuit to provide three sets of "signal processing circuit 200," nor any need to employ a time-domain multiplexing method to share the processing time of the "signal processing circuit 200." As a result, in view of the foregoing amendment to claim 1, the driving circuit of claim 1 of the present patent application is different from the driving circuit including the "signal processing circuit 200", the "amplifying block 300" and the "data drive circuit 430" of the cited Naito patent, and withdrawal of the rejection of claim 1 based on the Naito patent is respectfully requested. The other claims are directly or indirectly dependent on claim 1, and thus are distinguished from the prior art by the same reason.

IV. Response to Rejections Under 35 U.S.C. § 103

Examiner indicates that claims 3 and 5 of the present patent application are rejected under 35 U.S.C. § 103(a) as being unpatentable over US Pat. No. 6,462,735 (Naito et al.), in view of US Pat. No. 4,183,046 (Dalke et al.).

This rejection is respectfully traversed on the grounds that the Dalke patent, like

Amendment dated: October 19, 2006

Reply to OA of: April 19, 2006

the Naito patent, fails to disclose or suggest a "coding unit" for a flat panel display driving circuit that generates a plurality of "coded data" according to a plurality of

characteristic curves at the same time, wherein the plurality of characteristic curves

are Gamma curves for three chromatic lights (red, green, and blue), respectively, as

now recited in claim 1.

Although the Dalke patent does disclose that "coded data are inputted through sample/latch", the "sample/latch process" of Dalke is executed on a traditional color CRT television, and not on a flat panel display. Flat panel displays require an entirely different sample/latch arrangement than CRTs. Therefore, it would not have been obvious to include the circuit of Dalke in the flat panel display driver of Naito. To the contrary, the "technology gap" between a traditional color CRT television and a flat panel display is so huge that persons skilled in the art of the traditional color CRT television are a totally different group of technicians than those skilled in the art of the

anticipated, or found obvious, the "sample/latch process" of claims 3 and 5 of the

present patent application based on the "sample/latch process" executed in the

flat panel display. One skilled in the art of the flat panel display could not have

traditional color CRT television of the Dalke patent, and withdrawal of the rejection of

claims 3 and 5 based on the Naito and Dalke patents is respectfully requested.

CONCLUSION

In view of the foregoing remarks, reconsideration and allowance of the application are now believed to be in order, and such action is hereby solicited. If any

points remain in issue that the Examiner feels may be best resolved through a

-7-

Amendment dated: October 19, 2006

Reply to OA of: April 19, 2006

personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,

BACON & THOMAS, PLLC

By: BENJAMIN E. URCIA Registration No. 33,805

Date: October 19, 2006

BACON & THOMAS, PLLC 625 Slaters Lane, 4th Floor Alexandria, Virginia 22314

Telephone: (703) 683-0500